

# **EXHIBIT 20**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No.: 7:24-cv-00033

**GOOGLE LLC’S PROPOSED CLAIM TERMS FOR CONSTRUCTION**

Pursuant to the Scheduling Order governing this action (Dkt. 34), Google LLC (“Google”) hereby provides the below list of proposed claim terms, phrases, and/or clauses for construction for the following patents (collectively, the “Asserted Patents”) and claims (collectively, “Asserted Claims”) identified as asserted in Plaintiff VirtaMove’s September 6, 2024 Supplemental Preliminary Disclosure of Asserted Claims and Infringement Contentions:

- U.S. Pat. No. 7,519,814 (“the ’814 patent”) – claims 1, 2, 4, 6, 9, 10, 13, and 14;
- U.S. Pat. No. 7,784,058 (“the ’058 patent”) – claims 1–5, 10, and 18.

The claim terms, phrases, and/or clauses are identified in no particular order, and the order in which they are identified should not be taken as an indication of relative importance. Any further occurrence of a listed claim term, phrase, and/or clause is intended to receive the same construction as the listed term, phrase, and/or clause, regardless of whether the later occurrence is also listed below. Identification of a claim term, phrase, and/or clause herein is intended to include the term as a whole and/or its constituent parts. Google reserves the right to modify, supplement, or amend the list of claim terms, phrases, and/or clauses set forth below.

Discovery has not yet begun, Google's investigation is still ongoing, and Google has not yet considered VirtaMove's list of proposed claim terms for construction or participated in any conferences with VirtaMove regarding the same. Accordingly, Google provides this list based on its current knowledge and reserves the right to amend, modify, or supplement this list as necessary based on further discovery and understanding of VirtaMove's positions. VirtaMove's Supplemental Preliminary Disclosure of Asserted Claims and Infringement Contentions are vague and deficient and do not adequately disclose VirtaMove's infringement theories and claim interpretations. Google reserves the right to amend or supplement its identification of proposed terms and claim elements for construction in the event it obtains or discerns additional information through further investigation, discovery, or disclosure from VirtaMove or from third parties. In the event VirtaMove later attempts to further amend or supplement its infringement contentions, Google reserves the right to propose additional claim terms and elements for construction. Google further anticipates that this list may be modified after considering VirtaMove's list of proposed claim terms for construction and participating in conferences with VirtaMove regarding the same.

Google reserves the right to identify any of the terms for construction identified by VirtaMove. Google also reserves the right to modify this list based on VirtaMove's document productions and answers to interrogatories. Google reserves the right to propose no construction or plain and ordinary meaning for any of the terms identified below. Google also reserves the right to withdraw any of the terms identified below for construction.

Subject to the foregoing, Google identifies the below claim terms for construction:

<b>Claim Term</b>	<b>Patent</b>	<b>Claims</b>
processor	'814 patent, '058 patent	'814 patent, claim 1; '058 patent, claim 1

operating system	'814 patent, '058 patent	'814 patent, claims 1, 10; '058 patent, claim 1
kernel / operating system kernel	'814 patent, '058 patent	'814 patent, claim 1; '058 patent, claim 1
a kernel module	'058 patent	'058 patent, claim 5
kernel mode	'058 patent	'058 patent, claim 1
user mode	'058 patent	'058 patent, claim 1
servers	'814 patent	'814 patent, claim 1
disparate computing environments	'814 patent	'814 patent, claim 1
system files	'814 patent	'814 patent, claims 1, 4, 10, 14
service	'814 patent	'814 patent, claims 1, 14
shared library	'058 patent	'058 patent, claim 1
critical system elements	'058 patent	'058 patent, claim 1
container	'814 patent	'814 patent, claims 1, 2, 4, 6, 9, 10, 13, 14
within a container	'814 patent	'814 patent, claim 1
secure, executable, applications / applications are executed in a secure environment / secure containers of application software	'814 patent	'814 patent, claim 1
at least some of the different operating systems / at least some of the plurality of different operating systems	'814 patent	'814 patent, claim 1
memory accessible to at least some of the servers	'814 patent	'814 patent, claim 1
wherein some of the SLCSEs stored in the shared library....are accessible to some of the plurality of software applications / accessed by one or more of the plurality of software applications it	'058 patent	'058 patent, claim 1
it forms a part of the one or more of the plurality of software applications	'058 patent	'058 patent, claim 1
local kernel residing permanently on one of the servers	'814 patent	'814 patent, claim 1
copies or modified copies	'814 patent	'814 patent, claim 1
wherein SLCSEs are not copies of OSCSEs	'058 patent	'058 patent, claim 18

functional replicas of OSCSEs	'058 patent	'058 patent, claim 1
a unique instance of a corresponding critical system element	'058 patent	'058 patent, claim 1
wherein an instance of a SLCSE provided to at least a first of the plurality of software applications from the shared library is run in a context of said at least first of the plurality of software applications without being shared with other of the plurality of software applications and ...	'058 patent	'058 patent, claim 1
wherein SLCSEs stored in the shared library are linked to particular software applications of the plurality of software applications as the particular software applications are loaded such that the particular software applications have a link that provides unique access to a unique instance of a CSE	'058 patent	'058 patent, claim 10
a kernel a set of associated local system files [ <i>sic</i> ]	'814 patent	'814 patent, claim 1
an operating system's root file system	'814 patent	'814 patent, claim 1
whether the preamble is limiting	'814 patent, '058 patent	'814 patent, claim 1; '058 patent, claim 1

## Antecedent basis terms

a processor / the processor	'814 patent	'814 patent, claim 1
a plurality of servers / the servers	'814 patent	'814 patent, claim 1
one of the servers / the server	'814 patent	'814 patent, claim 1
operating systems / the operating systems	'814 patent	'814 patent, claim 1, 10
a plurality of different operating systems / the plurality of different operating systems	'814 patent	'814 patent, claim 1
one or more of the executable applications / the one or more of the executable applications	'814 patent	'814 patent, claim 1
a plurality of secure containers of application software / the containers of application software / the plurality	'814 patent	'814 patent, claims 1, 6, 9

of secure containers of application software / the containers		
a plurality of software applications / the plurality of software applications	'058 patent	'058 patent, claims 1, 4, 10
a processor / said processor	'058 patent	'058 patent, claim 1
an operating system / the operating system	'058 patent	'058 patent, claims 1, 2
a shared library / the shared library	'058 patent	'058 patent, claims 1, 2, 10
OS critical system elements (OSCSEs) / OSCSEs	'058 patent	'058 patent, claim 1, 3, 18
shared library critical system elements (SLCSEs) / the SLCSEs	'058 patent	'058 patent, claims 1, 3, 4, 10, 18
one or more of the plurality of software applications / the one or more of the plurality of software applications	'058 patent	'058 patent, claims 1, 4, 10
a first of the plurality of software applications / the first of the plurality of software applications / at least first of the plurality of software applications	'058 patent	'058 patent, claim 1
a second of the plurality of software applications / the second of the plurality of software applications	'058 patent	'058 patent, claim 1
a SLCSE related to a predetermined function / a first instance of the SLCSE	'058 patent	'058 patent, claim 1
a SLCSE for performing a same function / a second instance of the SLCSE	'058 patent	'058 patent, claim 1

Pursuant to the Scheduling Order, Google is prepared to meet and confer with VirtaMove at a mutually agreeable time to combine and finalize the parties' respective lists of claim terms and elements to be construed and to facilitate the preparation of the Joint Claim Construction Statement.

DATED: September 17, 2024

/s/ David A. Perlson

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**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that, on September 17, 2024, all counsel of record who have appeared in this case are being served with a copy of the foregoing via email.

Dated: September 17, 2024

/s/ Antonio Sistos  
Antonio Sistos